

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

ORLANDO RODRIGUEZ et al.

Plaintiffs,

v.

CROWLEY TOWING AND
TRANSPORTATION CO. et al.

Defendants.

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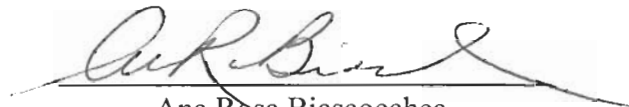
CIVIL NO. 97-2437 (CCC)
CIVIL NO. 98-1548 (CCC)

MOTION FOR LEAVE TO REPLY TO PLAINTIFFS' RESPONSE
TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Defendant Seafarers International Union, Atlantic, Gulf, Lakes and Inland Waters District/NMU, AFL-CIO (hereinafter "Union") respectfully moves this court for leave to file a reply to Plaintiffs' Response to Defendants' Motions for Summary Judgment. In addition, the Union requests that it be granted fourteen (14) days to respond to Plaintiffs' Response.

The Union requests this leave to file a reply in order to address the numerous inaccuracies contained in Plaintiffs' brief.

Respectfully submitted in San Juan, Puerto Rico this 30th. day of August, 2004.



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Leave to Reply was mailed, via first class mail, postage pre-paid, to this 30th day of August , 2004, to: J.H. Zidell, 300 71st Street, #605, Miami Beach, FL 33141; Raquel Dulzaides, P.O. Box 366104, San Juan, Puerto Rico 00936-6104; and Luis A. Suarez Zayas, 503 Calle Goyco, San Juan, PR 00915.


Ana Rosa Biascoechea